

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Mar 31, 2020

Kathy A. Surratt - States

KATHY A. SURRATT-STATES
Chief United States Bankruptcy Judge

In re:

FORESIGHT ENERGY, LP, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-41308-659
(Jointly Administered)

VERIFIED MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District of Missouri, I, Kurt F. Gwynne, move to be admitted *pro hac vice* to the bar of this Court for the purpose of representing Wilmington Trust, National Association, as indenture trustee for the 11.50% Senior Secured Notes due 2023, in the instant matter. In support of this motion, I submit the following information as required by Local Rule 12.01(F):

- a. *Full name of movant-attorney:*
Kurt F. Gwynne
- b. *Address and telephone number of movant-attorney:*
**Reed Smith LLP
1201 N. Market Street, Suite 1500
Wilmington, DE 19801
Telephone: (302) 778-7500**

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2020 MAR 30 AM 11:00
CLERK OF BANKRUPTCY COURT
EASTERN DISTRICT OF
ST. LOUIS, MISSOURI 63102

¹ The Debtors in these cases are each incorporated or organized in the state of Delaware, and along with the last four digits of each Debtor's federal tax identification number (or SEC filing number if unavailable), are: Foresight Energy LP (8894); Foresight Energy GP LLC (8332); Foresight Energy LLC (7685); Foresight Energy Employee Services Corporation (7023); Foresight Energy Services LLC (6204); Foresight Receivables LLC (2250); Sugar Camp Energy, LLC (8049); Macoupin Energy LLC (9005); Williamson Energy, LLC (9143); Foresight Coal Sales LLC (8620); Tanner Energy LLC (0409); Sitran LLC (9962); Seneca Rebuild LLC (0958); Oeneus LLC (6007); Adena Resources, LLC (4649); Hillsboro Transport LLC (6881); American Century Transport LLC (SEC No. 5786); Akin Energy LLC (1648); American Century Mineral LLC (SEC No. 5788); Foresight Energy Finance Corporation (5321); Foresight Energy Labor LLC (4176); Viking Mining LLC (4981); M-Class Mining, LLC (5272); MaRyan Mining LLC (7085); Mach Mining, LLC (4826); Logan Mining LLC (2361); LD Labor Company LLC (8454); Coal Field Repair Services LLC (9179); Coal Field Construction Company LLC (5694); Hillsboro Energy LLC (1639); and Patton Mining LLC (7251). The address of the Debtors' corporate headquarters is One Metropolitan Square, 211 North Broadway, Suite 2600, St. Louis, Missouri 63102.

- c. *Name of the firm or letterhead under which the movant practices*
Reed Smith LLP
- d. *Name of the law schools(s) movant attended and the date(s) of graduation therefrom:*
University of Pennsylvania Law School - 1992
- e. *State and federal bars of which the movant is a member, with dates of admission and registration numbers, if any:*
US Supreme Court - 2014
US District Court, Delaware - 2001
US District Court, New Jersey - 1994
US District, Eastern District New York - 2018
US District, Southern District of New York - 2018
US District Court, Eastern District of Michigan - 2000
US District Court, Central District of Illinois - 1999
US District Court, Northern District of Texas - 1997
US District Court, Eastern District of Pennsylvania - 1995
US District Court, Middle District of Pennsylvania - 1995
US District Court, Western District of Pennsylvania - 1995
Third Circuit Court of Appeals - 1998

Pennsylvania (No. 66390) – 1992
New Jersey (No. 023521992) – 1992
Delaware (No. 3951) – 2000
New York (No. 5605206) - 2018
- f. *Statement that attorney seeking admission is a member in good standing of all bars of which attorney is a member and that attorney is not under suspension or disbarment from any bar:*
Movant affirms that he is a member in good standing of all bars of which movant is a member and movant is not under suspension or disbarment from any bar.
- g. *Statement that attorney seeking admission does not reside in the Eastern District of Missouri, is not regularly employed in this District, and is not regularly engaged in the practice of law in this District:*
Movant affirms that he does not reside in the Eastern District of Missouri, is not regularly employed in this District, and is not regularly engaged in the practice of law in this District.

Movant attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that movant be admitted *pro hac vice* to the bar of this Court and be allowed to appear in the instant matter.

Dated: March 27, 2020

REED SMITH LLP



Kurt F. Gwynne

*Attorneys for Wilmington Trust, National
Association, as indenture trustee for the 11.50%
Senior Secured Notes due 2023, as amended*

ReedSmith

Driving progress
through partnership

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March 27 2020

VIA OVERNIGHT MAIL

Clerk of the Court
United States Bankruptcy Court for the
Eastern District of Missouri
Thomas F. Eagleton U.S. Courthouse
111 S. 10th Street, 4th Floor
St. Louis, MO 63102

Re: In re: Foresight Energy LP, Case No. 20-41308-659
U.S. Bankruptcy Court for the Eastern Dist. of Missouri

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CLERK OF THE COURT
U.S. DISTRICT COURT
EASTERN DISTRICT
ST. LOUIS, MISSOURI-MO

Clerk of the Court:

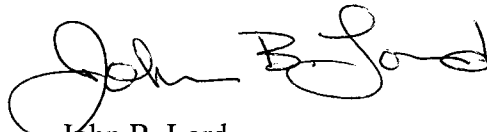
This firm is counsel to Wilmington Trust, National Association, as indenture trustee for the 11.50% Senior Secured Notes due 2023 in the above-referenced matter. Enclosed please find two (2) verified motions for admission *pro hac vice* for Kurt F. Gwynne, Esq. and Jason D. Angelo, Esq. (both of Reed Smith LLP in Wilmington, DE), as well as two (2) checks payable to "Clerk, U.S. District Court" for \$100.00/each. Due to the COVID-19 virus outbreak and Delaware's mandatory work restrictions, we have only provided electronically-signed versions of the motions for admission *pro hac vice* in lieu of original, physically signed versions.

We appreciate your attention to this matter. Also note, once the Court receives the motions for admission *pro hac vice* and payments thereto, Messrs. Gwynne and Angelo will be registering for CM/ECF filing privileges as *pro hac vice* counsel in the above-referenced matter.

Please contact Jason D. Angelo, Esq. at jangelo@reedsmith.com or me at jlord@reedsmith.com at the Court's convenience if the Court has further questions or requires additional information. Thank you.

Respectfully submitted,

REED SMITH LLP


John B. Lord
Bankruptcy Paralegal

/jbl
Enclosures